

**Memorandum**

FEB 25 2002  
*Thomas D. Roslewicz*  
Date Thomas D. Roslewicz  
Deputy Inspector General  
From for Audit Services

Subject Review of Pharmacy Acquisition Costs for Drugs Reimbursed Under the Medicaid  
Prescription Drug Program of the Florida Agency for Health Care Administration  
(A-06-01-00002)

To  
Neil Donovan  
Director, Audit Liaison Staff  
Centers for Medicare & Medicaid Services

As part of self-initiated audits by the Office of Inspector General, we are alerting you to the issuance within 5 business days from the date of this memorandum of our final report entitled, "Review of Pharmacy Acquisition Costs for Drugs Reimbursed Under the Medicaid Prescription Drug Program of the Florida Agency for Health Care Administration. A copy of the report is attached. This report is one of a series of reports involving our multi-State review of pharmacy acquisition costs for drugs. We suggest you share this report with components of the Centers for Medicare & Medicaid Services (CMS) involved with program integrity, provider issues, and State Medicaid agency oversight, particularly the Center for Medicaid and State Operation.

Most States use average wholesale price (AWP) minus a percentage discount, which varies by State, as a basis for reimbursing pharmacies for drug prescriptions. Therefore, the objective of this review was to develop for the Florida Medicaid program an estimate of the discount below AWP at which pharmacies purchase brand name and generic drugs.

Through use of statistical sampling, we obtained from Florida retail pharmacies 2,349 invoice prices for brand name drugs, and 1,235 invoice prices for generic drugs. Our estimate of the overall discount below AWP for the invoice prices we reviewed was 22.88 percent for brand name drugs and 68.19 percent for generic drugs. Our national estimates, included in reports we previously issued to you,<sup>1</sup> were 21.84 percent and 65.93 percent, respectively. The estimates combined the results for four categories of pharmacies, including rural-chain, rural-independent, urban-chain, and urban-independent. The estimates excluded the results obtained from non-traditional pharmacies (nursing home pharmacies, hospital pharmacies, home IV, etc.) because we believe such pharmacies are able to purchase drugs at substantially greater discounts than retail pharmacies and including those discounts would inflate our estimates.

<sup>1</sup> Final report dated August 10, 2001 entitled, "Medicaid Pharmacy – Actual Acquisition Cost of Brand Name Prescription Drug Products (A-06-00-00023)." Draft report dated August 20, 2001 entitled, "Medicaid Pharmacy – Actual Acquisition Cost of Generic Prescription Drug Products (A-06-01-00053)."

We recommended that the Florida Agency's for Health Care Administration (State Agency) consider the results of our review as a factor in any future changes to pharmacy reimbursement for Medicaid drugs. The State Agency requested that we provide an additional estimate of the discount off AWP for single source brand name drugs and innovator multiple source brand name drugs. We agree with the State Agency's request that we provide an additional estimate of the discount off AWP for single source brand name drugs. We are currently in the process of analyzing our data and we plan to provide the results in a separate report. Additionally, we plan to provide an estimate for drugs without Federal upper limits (including innovator multiple source drugs) and an estimate for drugs with Federal upper limits.

Any questions or comments on any aspect of this memorandum are welcome. Please address them to George M. Reeb, Assistant Inspector General for Health Care Financing Audits, at (410) 786-7104 or Gordon L. Sato, Regional Inspector General for Audit Services, Region VI, at (214) 767-8414.

Attachment

**Department of Health and Human Services**

**OFFICE OF  
INSPECTOR GENERAL**

**REVIEW OF  
PHARMACY ACQUISITION COSTS FOR  
DRUGS REIMBURSED UNDER THE  
MEDICAID PRESCRIPTION DRUG  
PROGRAM OF THE  
FLORIDA AGENCY FOR  
HEALTH CARE ADMINISTRATION**



**JANET REHNQUIST**  
Inspector General

**FEBRUARY 2002**  
**A-06-01-00002**



DEPARTMENT OF HEALTH & HUMAN SERVICES

Office of Inspector General

Office of Audit Services  
1100 Commerce, Room 686  
Dallas, TX 75242

FEB 28 2002

Common Identification Number: A-06-01-00002

Bob Sharpe  
Deputy Secretary for Medicaid  
Florida Agency for Health Care Administration  
2728 Mahan Drive – Mail Stop #8  
Tallahassee, Florida 32308

Dear Mr. Sharpe:

Enclosed are two copies of the Department of Health and Human Services (HHS), Office of Inspector General (OIG), Office of Audit Services' (OAS) final report entitled, "Review of Pharmacy Acquisition Costs for Drugs Reimbursed Under the Medicaid Prescription Drug Program of the Florida Agency for Health Care Administration." A copy of this report will be forwarded to the action official noted below for review and any action deemed necessary.

Final determination as to actions taken on all matters reported will be made by the HHS action official. We request that you respond to the HHS action official within 30 days from the date of this letter. Your response should present any comments or additional information that you believe may have a bearing on the final determination.

In accordance with the principles of the Freedom of Information Act, 5 U.S.C. 522, as amended by Public Law 104-231, OIG, OAS reports issued to the Department's grantees and contractors are made available to members of the press and general public to the extent information contained therein is not subject to exemptions in the Act which the Department chooses to exercise. (See 45 CFR part 5). As such, within 10 business days after the final report is issued, it will be posted on the world wide web at <http://oig.hhs.gov>.

To facilitate identification, please refer to common identification number A-06-01-00002 in all correspondence relating to this report.

Sincerely yours,

Gordon L. Sato  
Regional Inspector General  
for Audit Services

Enclosure

Page 2 - Mr. Bob Sharpe

**Direct Reply to HHS Action Official:**

Rose Crum-Johnson  
Regional Administrator  
Centers for Medicare & Medicaid Services  
Atlanta Federal Center  
61 Forsyth Street, SW, Suite 4T20  
Atlanta, Georgia 30303-8909

## SUMMARY

As a follow-up to our previous work, the Office of Inspector General conducted a nationwide review of pharmacy acquisition costs for drugs reimbursed under the Medicaid prescription drug program. Most States use average wholesale price (AWP) minus a percentage discount, which varies by State, as a basis for reimbursing pharmacies for drug prescriptions. Therefore, the objective of this review was to develop an estimate of the discount below AWP at which pharmacies purchase brand name and generic drugs.

To accomplish our objective, we selected a stratified random sample of 8 States from a universe of 48 States and the District of Columbia. Arizona was excluded from the universe of States because the Medicaid drug program is a demonstration project using prepaid capitation financing. Tennessee was also excluded because of a waiver received to implement a managed care program for Medicaid. Florida was one of the sample States selected, as well as Colorado, Indiana, Montana, Texas, Washington, West Virginia, and Wisconsin.

In addition, a random sample of Medicaid provider pharmacies from each State was selected. The pharmacies were selected from each of five categories--rural-chain, rural-independent, urban-chain, urban-independent and non-traditional pharmacies (nursing home pharmacies, hospital pharmacies, home IV, etc.). We included the non-traditional category so as to be able to exclude those pharmacies from our overall estimates. We believe such pharmacies are able to purchase drugs at substantially greater discounts than retail pharmacies, and including those discounts would inflate our estimates.

We compared each invoice drug price to AWP for that drug and calculated the percentage, if any, by which the invoice price was discounted below AWP. We then projected those differences to the universe of pharmacies in each category for each State and calculated an overall estimate for each State. Additionally, we projected the results from each State to estimate the nationwide difference between invoice price and AWP for each category.

In Florida, we obtained drug pricing information from 39 pharmacies (including non-traditional). Specifically, we obtained 2,349 invoice prices for brand name drugs, and 1,235 invoice prices for generic drugs (excluding non-traditional). For Florida, our estimate of the overall discount below AWP for the invoice prices we reviewed was 22.88 percent for brand name drugs and 68.19 percent for generic drugs. The national estimates were 21.84 percent and 65.93 percent, respectively. Our previous estimates, based on Calendar Year 1994 pricing data, were 18.30 percent and 42.45 percent, respectively. The estimates combined the results for four categories of pharmacies including rural-chain, rural-independent, urban-chain, and urban-independent, and excluded the results obtained from non-traditional pharmacies.

We recommended that the Florida Agency for Health Care Administration (State Agency) consider the results of this review as a factor in any future changes to pharmacy reimbursement for Medicaid drugs. The State Agency responded to our draft report in a letter dated December 19, 2001. The State Agency requested that we provide an additional estimate of the discount off AWP for single source brand name drugs and innovator multiple source brand name drugs.

We agree with the State Agency's request that we provide an additional estimate of the discount off AWP for single source brand name drugs. We are currently in the process of analyzing our data and we plan to provide the results in a separate report. Additionally, we plan to provide an estimate for drugs without Federal upper limits (including innovator multiple source drugs) and an estimate for drugs with Federal upper limits.

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## INTRODUCTION

The Office of Inspector General (OIG) conducted a review of pharmacy acquisition costs for drugs reimbursed under the Medicaid prescription drug program of the Florida Agency for Health Care Administration (State Agency). The objective of this review was to develop an estimate of the discount below average wholesale price (AWP) at which pharmacies purchase brand name and generic drugs. This review was conducted as part of a nationwide review of pharmacy acquisition costs. Florida was one of eight States randomly selected as part of the nationwide review (see **APPENDICES 3 and 5** for the results of our nationwide sample).

## BACKGROUND

Medicaid regulations provide for the reimbursement of drugs using two methods. If a drug is a multiple source (generic) drug, then reimbursement is based on the lower of the pharmacist's usual and customary charge to the general public or an upper limit amount plus a dispensing fee. The Federal upper limit amounts are established by the Centers for Medicare & Medicaid Services (CMS). If a drug is a single source (brand name) drug, or a generic drug for which an upper limit amount has not been established, then the reimbursement is the lower of the pharmacist's usual and customary charge to the general public or the estimated acquisition cost (EAC) plus a reasonable dispensing fee. The State agencies are responsible for determining the EAC and the dispensing fee.

The EAC for most States is calculated by using AWP for a drug less a percentage discount. The AWP is the price assigned to the drug by its manufacturer and is compiled by the **Red Book**, **First DataBank**, and **Medi-Span** for use by the pharmaceutical community. Prior to 1984, most States used 100 percent of AWP for reimbursement of acquisition costs. However, the OIG issued a report in 1984, which stated that, on average, pharmacies purchased drugs for 15.9 percent below AWP. In 1989, the OIG issued a follow-up report that found that pharmacies were purchasing drugs at discounts of 15.5 percent below AWP. Both the 1984 and 1989 reports combined brand name and generic drugs in calculating the percentage discounts and included a comparison of 3,469 and 4,723 purchases, respectively.

In 1989, CMS issued a revision to the State Medicaid Manual (Manual) which pointed out that a preponderance of evidence demonstrated that AWP overstated prices that pharmacies actually paid for drugs by as much as 10 to 20 percent. The Manual issuance further provided that, absent valid documentation to the contrary, it would not be acceptable for a State to make reimbursements using AWP without a significant discount.

In 1997, OIG issued separate reports on the actual acquisition cost of brand name and generic drugs. The 1997 reports were based on comparisons of 18,973 invoice prices for brand name products and 9,075 invoice prices for generic products. The reports showed average discounts of 18.30 percent below AWP and 42.45 percent below AWP, respectively. Medicaid drug program expenditures in Calendar Year (CY) 1994 totaled about \$9.4 billion. In CY 1999, nationwide drug expenditures for the program increased to about \$17.9 billion. Florida reported Medicaid drug expenditures of \$1.14 billion in CY 1999.

## SCOPE

Our review was performed in accordance with generally accepted government auditing standards. The objective of our review was to develop an estimate of the difference between AWP and the actual invoice prices of both brand name and generic prescription drugs to Medicaid pharmacy providers. Our objective did not require that we identify or review any internal control system

Our review was limited to ingredient acquisition costs and did not address other areas such as: the effect of Medicaid business as a contribution to other store sales; the cost to provide professional services other than dispensing a prescription for instances such as therapeutic interventions, patient education, and physician consultation; and the cost of dispensing which includes costs for computers, multi-part labels, containers, technical staff, transaction fees, Medicaid-specific administrative costs, and general overhead.

We obtained a listing of all Medicaid pharmacy providers from the State Agency. The State Agency was responsible for classifying each pharmacy as chain, independent, or non-traditional. For purposes of this review, a chain was defined as four or more pharmacies with common ownership. We determined whether each pharmacy was rural or urban by comparing the county location for each pharmacy to a 1999 listing of metropolitan statistical areas and their components. We selected a stratified random sample of 40 pharmacies from a universe of 3,276 pharmacies, with 8 pharmacies selected from each of 5 strata--rural-chain, rural-independent, urban-chain, urban-independent, and non-traditional (nursing home pharmacies, hospital pharmacies, home IV, etc.) We included the non-traditional category so as to be able to exclude those pharmacies from our estimates. We believe that such pharmacies are able to purchase drugs at substantially greater discounts than a retail pharmacy and including those discounts would inflate our estimate.

We requested, from each pharmacy selected, the largest invoice from each different source of supply for a specified month in CY 1999. Supply sources include wholesalers, chain warehouse distribution centers, generic distributors, and manufacturers. Each pharmacy was initially assigned a month from January 1999 through December 1999 in order to provide a cross-section of this 12-month time period. However, we permitted some pharmacies to provide invoices from other months in 1999, if invoices were not available for the requested period.

We reviewed every line item on the invoices supplied by the sample pharmacies to ensure that the invoices contained the information necessary for our review. We eliminated over-the-counter items. Some invoices did not include National Drug Codes (NDC), which were needed to obtain AWP for the drug. We attempted to obtain NDCs in those instances. We used the **2000 Red Book**, a nationally recognized reference for drug product and pricing information, to obtain NDCs and identify over-the-counter items. Two prominent wholesalers, as well as four chain stores, whose invoices contained the wholesaler item number rather than NDCs, provided us with a listing that converted their item numbers to an NDC. If we were unable to identify the NDC for a drug, we eliminated the drug.

To verify the drug name, we utilized the drug product file on the CMS web site. In addition to verifying the drug name, we were also able to determine the drug-type indicator from this file. The drug-type indicator showed whether the drug was single source, innovator multiple source, or non-innovator multiple source. We considered single source and innovator multiple source drugs as

brand name drugs. Non-innovator drugs were classified as generic drugs. We obtained a drug pricing file from **First DataBank** through the State of Florida for the purpose of obtaining the AWP for each drug. We compared the invoice drug price to AWP for each drug and calculated the percentage, if any, by which the invoice price was discounted below AWP. If a drug listed on an invoice was not on the pricing file, we eliminated that drug.

Since some States also use wholesalers acquisition cost (WAC) in their reimbursement methodology, we also compared the invoice drug price to WAC for each drug for which WAC was available on the pricing file. We calculated the percentage, if any, by which WAC must be increased to equate the invoice price. The results of the WAC comparisons are reported in **APPENDICES 4 and 5**.

We used OIG Office of Audit Services (OAS) statistical software to calculate all estimates as well as to generate all random numbers. We obtained the total number of pharmacies in the universe from the National Council for Prescription Drug Programs. We did not independently verify any information obtained from third-party sources. Additionally, we did not attempt to identify any special discounts, rebates, or other types of special incentives not reflected on the invoices. Our review was conducted by our Little Rock, Arkansas OAS field office from July 2000 through June 2001. (See **APPENDIX 1** for a description of our sample.)

## **FINDINGS**

### **BRAND NAME DRUGS**

We estimated that the invoice price for brand name drugs was 22.88 percent below AWP. The estimate combined all pharmacy categories except non-traditional pharmacies and was based on the comparison to AWP of 2,349 invoice prices received from 31 pharmacies. The standard deviation for this estimate was 3.30 percent (see **APPENDIX 2**).

The estimates by individual categories for brand name drugs are summarized in the following table:

**Estimated Difference Between AWP and Invoice Price  
for Brand Name Drugs**

<b>Category</b>	<b>Percent Below AWP (Point Estimate)</b>	<b>Standard Deviation</b>	<b>Sample Pharmacies</b>	<b>Drug Prices Reviewed</b>
Rural-Chain	22.24	4.41	7	267
Rural-Independent	19.00	0.77	8	547
Urban-Chain	24.14	13.26	8	1,252
Urban-Independent	19.49	2.48	8	283
Non-Traditional	36.41	19.05	8	111
Overall (Exc. Non-Trad.)	22.88	3.30	31	2,349

**GENERIC DRUGS**

We estimated that the invoice price for generic drugs was 68.19 percent below AWP. Once again, the estimate combined all pharmacy categories except non-traditional pharmacies. The estimate was based on the comparison to AWP of 1,235 invoice prices received from 31 pharmacies. The standard deviation for this estimate was 0.91 percent (see **APPENDIX 2**). The following table summarizes the results by category for generic drugs:

**Estimated Difference Between AWP and Invoice Price  
for Generic Drugs**

<b>Category</b>	<b>Percent Below AWP (Point Estimate)</b>	<b>Standard Deviation</b>	<b>Sample Pharmacies</b>	<b>Drug Prices Reviewed</b>
Rural-Chain	65.40	6.69	7	212
Rural-Independent	65.54	8.92	8	144
Urban-Chain	69.13	3.10	8	775
Urban-Independent	66.14	5.88	8	104
Non-Traditional	65.85	13.05	6	79
Overall (Exc. Non-Trad.)	68.19	0.91	31	1,235

**WAC RESULTS**

In addition to our comparison of AWP to invoice price, we also compared WAC to invoice price. This was done because some States use WAC plus a percentage in their pharmacy reimbursement methodology. We estimated that the invoice price for brand name drugs was 0.73 percent below

WAC rather than a percentage to be added to WAC. The estimate combined all pharmacy categories except non-traditional pharmacies and was based on the comparison to AWP of 1,916 invoice prices received from 31 pharmacies.

We also estimated that the invoice price for generic drugs was 33.92 percent below WAC. The estimate also combined all pharmacy categories except non-traditional pharmacies and was based on the comparison to AWP of 895 invoice prices received from 31 pharmacies. A more detailed description of the WAC results, including the nationwide estimates is shown in **APPENDICES 4 and 5**.

## **CONCLUSIONS AND RECOMMENDATION**

Based on our review, we determined that there was a significant difference between AWP and pharmacy acquisition costs. The difference between AWP and pharmacy acquisition costs was significantly greater for generic drugs than for brand name drugs. We recognize that acquisition cost is just one factor in pharmacy reimbursement policy and that any change to that policy should also consider the other factors discussed in the **SCOPE** section of our report.

Additionally, the effect of Federal upper limit amounts on generic drug reimbursements or usual and customary charge limitations should be taken into consideration. However, a change in any of the factors affecting pharmacy reimbursement could have a significant impact on expenditures because of the size of the program. We believe that the difference between AWP and pharmacy acquisition costs as determined by our review was significant enough to warrant consideration by the State in any evaluation of their Medicaid drug program. Therefore, we recommended that the State Agency consider the results of this review as a factor in determining any future changes to pharmacy reimbursement for Medicaid drugs.

## **STATE AGENCY'S COMMENTS**

The State Agency responded to our draft report in a letter dated December 19, 2001. The State Agency requested that we issue an addendum to our report reflecting a separate estimate of the discount off AWP for single source brand name drugs and innovator multiple source drug products. The State Agency believed that the requested information would provide State Medicaid programs with more viable information to use in determining appropriate reimbursement.

The State Agency stated that their own review of the data used in our report showed a discount of 18.21 percent off AWP for single source drugs. The State agency also noted that some of the drug products classified as single source drugs by the CMS data were actually generic products. The complete text of the State Agency's comments is included as **APPENDIX 6**.

## **OIG'S RESPONSE**

We agree with the State Agency's request that we provide an additional estimate of the discount off AWP for single source brand name drugs. We are currently in the process of analyzing our data and we plan to provide the results in a separate report.

Additionally, we plan to provide an estimate for drugs without Federal upper limits (including innovator multiple source drugs) and an estimate for drugs with Federal upper limits. For purposes of identifying single source drugs, we will use information available on **First DataBank**'s pricing file for this new report. Drug classifications from CMS are the drug manufacturers' representations. The manufacturers pay a greater Medicaid rebate on brand name drugs than on generic drugs so there is an incentive for the manufacturer to correctly classify the drug. Therefore, we believe that it was appropriate to use CMS' data for purposes of this report.

## **APPENDICES**

## **SAMPLE DESCRIPTION**

### Sample Objectives:

Develop an estimate of the extent of the discount below AWP of actual invoice prices to Medicaid pharmacies in Florida for brand name drugs and for generic drugs.

### Population:

The sampling population was pharmacy providers participating in the Medicaid prescription drug program of the State Agency.

### Sampling Frame:

The sampling frame was a listing of all pharmacy providers participating in the Medicaid prescription drug program.

### Sample Design:

A sample of eight pharmacies was randomly selected from each of five strata. The five strata of pharmacies were rural-chain, rural-independent, urban-chain, urban-independent, and non-traditional (nursing home pharmacies, hospital pharmacies, home IV, etc.). Each pharmacy was assigned a month from 1999 for which to provide invoices. All pharmacies were initially assigned a month from January through December in a method designed to provide a cross-section of the 12-month period. However, some pharmacies were permitted to submit invoices from other months as invoices were not available for the month originally assigned. The largest invoice from each of four different sources of supply was requested. The sources of supply were identified as wholesalers, chain warehouse distribution centers, generic distributors, and direct manufacturer purchases. All invoice prices were compared to AWP.

### Sample Size:

Eight pharmacies were selected from each stratum for a total of 40 pharmacies.

### Source of Random Numbers:

We used OAS statistical sampling software to generate the random numbers.



Characteristics to be Measured:

From our review of the pharmacy invoices, we calculated the percentage discount below AWP of actual invoice prices for all drugs on the invoices submitted.

Treatment of Missing Sample Items:

No spare was substituted for a pharmacy that did not provide information. If a pharmacy did not send an invoice for a particular type of supplier, we assumed that the pharmacy did not purchase drugs from that type of supplier during the month assigned to the pharmacy.

Estimation Methodology:

We used OAS statistical software to project the percentage difference between AWP and actual invoice prices for each stratum, as well as an overall percentage difference. The overall percentage difference excluded the non-traditional pharmacies. The projections were done separately for brand name drugs and generic drugs.

Other Evidence:

We obtained AWP from a pricing file received from the State of Florida.

## FLORIDA SAMPLE RESULTS - AWP

BRAND NAME DRUGS – AWP							
Category	Universe of Pharmacies	Sample Pharmacies	Drug Prices Reviewed	Percent Below AWP			
				Sample		90 Percent Confidence Level	
				Mean	Standard Deviation	Lower Limit	Upper Limit
RURAL-CHAIN	137	7	267	22.24	4.41	19.57	24.92
RURAL-INDEPENDENT	68	8	547	19.00	0.77	18.58	19.42
URBAN-CHAIN	2,052	8	1,252	24.14	13.26	16.44	31.84
URBAN-INDEPENDENT	656	8	283	19.49	2.48	18.05	20.92
NON-TRADITIONAL	363	8	111	36.41	19.05	25.46	47.37
OVERALL (EXCL. NON TRAD.)	2,913	31	2,349	22.88	3.30	17.45	28.32
GENERIC DRUGS – AWP							
Category	Universe of Pharmacies	Sample Pharmacies	Drug Prices Reviewed	Percent Below AWP			
				Sample		90 Percent Confidence Level	
				Mean	Standard Deviation	Lower Limit	Upper Limit
RURAL-CHAIN	137	7	212	65.40	6.69	61.35	69.45
RURAL-INDEPENDENT	68	8	144	65.54	8.92	60.67	70.41
URBAN-CHAIN	2,052	8	775	69.13	3.10	67.33	70.92
URBAN-INDEPENDENT	656	8	104	66.14	5.88	62.74	69.54
NON-TRADITIONAL	363	6	79	65.85	13.05	57.16	74.54
OVERALL (EXCL. NON TRAD.)	2,913	31	1,235	68.19	0.91	66.70	69.69

## NATIONWIDE SAMPLE RESULTS - AWP

BRAND NAME DRUGS – AWP				
Category	Universe of Pharmacies	Sample Pharmacies	Drug Prices Reviewed	Percent Below AWP (Point Estimate)
Rural-Chain	1,008	52	3,533	20.68
Rural-Independent	1,243	55	2,628	20.86
Urban-Chain	5,745	56	7,719	22.19
Urban-Independent	2,398	53	2,324	22.00
Non-Traditional	1,123	61	1,528	31.18
Overall (Excl. Non-Trad.)	10,394	216	16,204	21.84
GENERIC DRUGS – AWP				
Category	Universe of Pharmacies	Sample Pharmacies	Drug Prices Reviewed	Percent Below AWP (Point Estimate)
Rural-Chain	1,008	52	2,073	64.39
Rural-Independent	1,243	55	1,142	66.64
Urban-Chain	5,745	56	4,491	66.97
Urban-Independent	2,398	54	1,022	63.70
Non-Traditional	1,123	58	1,185	67.07
Overall (Excl. Non-Trad.)	10,394	217	8,728	65.93

## FLORIDA SAMPLE RESULTS - WAC

BRAND NAME DRUGS – WAC							
Category	Universe of Pharmacies	Sample Pharmacies	Drug Prices Reviewed	WAC Plus Percent			
				Sample		90 Percent Confidence Level	
				Mean	Standard Deviation	Lower Limit	Upper Limit
RURAL-CHAIN	137	7	175	-2.49	3.28	-4.47	-0.50
RURAL-INDEPENDENT	68	8	448	-0.63	0.70	-1.01	-0.24
URBAN-CHAIN	2,052	8	1,094	-0.80	2.31	-2.14	0.54
URBAN-INDEPENDENT	656	8	199	-0.15	3.01	-1.89	1.59
NON-TRADITIONAL	363	7	81	-25.13	21.67	-38.47	-11.79
OVERALL (EXCL. NON TRAD.)	2,913	31	1,916	-0.73	0.62	-1.76	0.30
GENERIC DRUGS – WAC							
Category	Universe of Pharmacies	Sample Pharmacies	Drug Prices Reviewed	WAC Plus Percent			
				Sample		90 Percent Confidence Level	
				Mean	Standard Deviation	Lower Limit	Upper Limit
RURAL-CHAIN	137	7	158	-31.00	12.09	-38.32	-23.68
RURAL-INDEPENDENT	68	8	112	-28.33	10.11	-33.85	-22.80
URBAN-CHAIN	2,052	8	542	-34.80	8.37	-39.66	-29.94
URBAN-INDEPENDENT	656	8	83	-32.34	14.00	-40.43	-24.25
NON-TRADITIONAL	363	6	62	-34.72	13.07	-43.42	-26.01
OVERALL (EXCL. NON TRAD.)	2,913	31	895	-33.92	2.37	-37.81	-30.02

## NATIONWIDE SAMPLE RESULTS - WAC

BRAND NAME DRUGS – WAC				
Category	Universe of Pharmacies	Sample Pharmacies	Drug Prices Reviewed	WAC Plus Percent (Point Estimate)
Rural-Chain	1,008	52	2,249	-1.93
Rural-Independent	1,243	55	2,101	-2.59
Urban-Chain	5,745	56	6,239	-1.13
Urban-Independent	2,398	53	1,543	-2.98
Non-Traditional	1,123	58	1,168	-14.99
Overall (Excl. Non-Trad.)	10,394	216	12,132	-1.81
GENERIC DRUGS – WAC				
Category	Universe of Pharmacies	Sample Pharmacies	Drug Prices Reviewed	WAC Plus Percent (Point Estimate)
Rural-Chain	1,008	52	1,569	-27.13
Rural-Independent	1,243	55	856	-27.01
Urban-Chain	5,745	56	3,193	-33.04
Urban-Independent	2,398	54	752	-27.80
Non-Traditional	1,123	56	893	-35.97
Overall (Excl. Non-Trad.)	10,394	217	6,370	-30.55



JEB BUSH, GOVERNOR

RHONDA M. MEDOWS, MD, FAAFP, SECRETARY

December 19, 2001

Mr. Gordon L. Sato  
Regional Inspector General  
Office of Audit Services  
1100 Commerce, Room 6B6  
Dallas, TX 75242-1027

Dear Mr. Sato

Thank you for the opportunity to comment on the draft report of pharmacy acquisition costs for drugs conducted by your agency.

As you are aware, this report generated vigorous responses from the retail pharmacy community and their trade associations. These responses both question the validity of the published results for brand name drugs and criticize the sampling method because weighting by utilization was not conducted. I believe there is a straightforward and simple way to address the issue regarding validity of the discounts for brand name drugs.

We requested and were supplied the data results for Florida specific data. My staff separated this data into pure single source products, which are not typically discounted competitively, and innovator multi-source products, which are more competitive and frequently discounted more heavily. Non-traditional pharmacies such as nursing home, closed door and infusion pharmacies were also removed from the sample because they typically receive more favorable pricing than community retail pharmacies. This resulted in single source brands reflecting AWP discounts averaging 18.21% and innovator multi-source drugs an average of 27.81%. As you know, innovator multi-source drugs are available generically and are much more competitive.

Non-traditional pharmacy AWP discounts for the identified products reflected 26.62% for single source brands and 43.41% for innovator multi-source products. These are predictable and confirm the ability of closed shop pharmacies to negotiate pricing concessions from pharmaceutical manufacturers that may not be available to community based pharmacies.

An additional concern is the use of CMS rebate tape classifications for the drug products. Several products identified, as single source brands by their manufacturer, are actually generic products with AWP discounts greater than 60%. Conversely, a few items classified as generic products by their manufacturer are in fact, only available from one source and the relatively minimal AWP discount reflects that status. These changes would require manual review and intervention and may be beyond the capabilities of your review.



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Mr. Sato  
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December 19, 2001

This letter is to request that you instruct your staff to issue an addendum to the report reflecting these separations of single source only and innovator multi-source drug products, and to more clearly identify the classes of trade in each case. I am sure with these changes the report will be a more viable tool for state Medicaid programs to use in determining appropriate reimbursement levels for their prescribed drug programs.

If you have any questions please contact me at (850) 488-3560 or our pharmacy bureau chief, George Kitchens at (850) 487-1447.

Sincerely,

A handwritten signature in cursive script, appearing to read "Bob Sharpe".

Bob Sharpe  
Deputy Secretary for Medicaid

BS:jfw